

1 W. West Allen, Esq.  
 Nevada Bar No. 5566  
 2 Jonathan W. Fountain, Esq.  
 Nevada Bar No. 10351  
 3 HOWARD & HOWARD ATTORNEYS PLLC  
 3800 Howard Hughes Parkway, Suite 1000  
 4 Las Vegas, Nevada 89169  
 Telephone: (702) 257-1483  
 5 Email: [wwa@h2law.com](mailto:wwa@h2law.com)  
 Email: [jwf@h2law.com](mailto:jwf@h2law.com)  
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Attorneys for Plaintiff MJL 12, LLC

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 8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 MJL 12, LLC, a Nevada limited liability  
 company,

10 Plaintiff,

11 vs.

12 TRIUMPH INTERNATIONAL LLC, a  
 13 California limited liability company,

14 Defendant.

Case No. 2:24-cv-00122-GMN-EJY

**STIPULATION AND ~~PROPOSED~~**  
**ORDER STAYING DISCOVERY**

15 Plaintiff MJL 12, LLC (“Plaintiff” or “MJ Live”) and Defendant TRIUMPH  
 16 INTERNATIONAL, LLC (“Defendant” or the “Estate”), by and through their respective counsel  
 17 of record, hereby agree and stipulate as follows:

18 Plaintiff filed its Complaint on January 17, 2024. (ECF No. 1.) On April 26, 2024,  
 19 Defendant appeared and filed its motion seeking partial dismissal of the Complaint. (ECF No.  
 20 13.) On May 17, 2024, Plaintiff filed its First Amended Complaint. (ECF No. 25.) On May 24,  
 21 2024, the parties stipulated to withdraw the motion to dismiss as moot and extend the time for  
 22 Plaintiff to file its response to the First Amended Complaint. (ECF No. 27.) On June 14, 2024,  
 23 Defendant filed its motion seeking partial dismissal of the First Amended Complaint. (ECF No.  
 24 29.) Plaintiff filed its response on July 19, 2024. (ECF No. 34.) Defendant filed its reply brief  
 25 on August 9, 2024. (ECF No. 36.) The motion remains pending before the Court. On August  
 26 2, 2024, the Court entered a minute order requiring the parties to file their joint discovery plan  
 27 and proposed scheduling order *or a stipulation to stay discovery* within 14 days. (ECF No. 35.)

28 Considering the pendency of Defendant’s motion to dismiss, and to accommodate the

parties' desire to continue settlement negotiations without the burden and expense of discovery, which the parties submit constitutes good cause for a stay of discovery, the parties hereby agree and stipulate to stay discovery until thirty (30) days after the Court rules on the pending motion to dismiss. The parties agree to file a joint discovery plan and proposed scheduling order within thirty (30) days after the Court rules on the pending motion to dismiss.

**IT IS SO AGREED AND STIPULATED:**

HOWARD & HOWARD ATTORNEYS PLLC

PISANELLI BICE PLLC

By: /s/ Jonathan W. Fountain  
 W. West Allen, Esq.  
 Nevada Bar No. 5566  
 Jonathan W. Fountain, Esq.  
 Nevada Bar No. 10351  
 3800 Howard Hughes Parkway, Ste. 1000  
 Las Vegas, Nevada 89169  
 Telephone: (702) 257-1483

By: /s/ Todd L. Bice  
 Todd L. Bice, Esq.  
 Nevada Bar No. 4534  
 Daniel R Brady, Esq.  
 400 South 7th Street, Suite 300  
 Las Vegas, Nevada 89101  
 Telephone: (702) 214-2100

*Attorneys for Plaintiff*  
 MJL 12, LLC

KINSELLA HOLLEY ISER KUMP  
 STEINSAPIR LLP  
 Jonathan Steinsapir, Esq. (Pro Hac Vice)  
 Gregory P. Korn, Esq. (Pro Hac Vice)  
 11766 Wilshire Boulevard, Suite 750  
 Los Angeles, California 90025  
 Telephone: (310) 566-9800

QUINN EMANUEL URQUHART &  
 SULLIVAN, LLP  
 Alex Spiro, Esq. (Pro Hac Vice)  
 Todd Anten, Esq. (Pro Hac Vice)  
 51 Madison Ave., 22nd Floor  
 New York, New York 10010  
 Telephone: (212) 849-7000

*Attorneys for Defendant*  
 Triumph International, LLC

**IT IS SO ORDERED:**

  
 UNITED STATES MAGISTRATE JUDGE

DATED: August 15, 2024

HOWARD & HOWARD ATTORNEYS PLLC